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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

WHITNEY MITCHELL,

Case No.: 2:21-cv-00020-JAD-EJY

Plaintiff,

V.

AUTO MART LLC and RIGHT-NOW
RECOVERY LLC.

Defendants

**AMENDED STIPULATION AND ORDER
TO EXTEND DEADLINE FOR
DEFENDANT, RIGHT-NOW-
RECOVERY, LLC TO FILE RESPONSE
IN OPPOSITION TO PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT**

(First Request) ECF No. 25

COME NOW, Plaintiff, WHITNEY MITCHELL (“Plaintiff”) and Defendant, RIGHT-NOW-RECOVERY, LLC, a Florida limited liability company (“Defendant”), by and through their undersigned counsel, and hereby stipulate to the following:

1. On November 18, 2021, Defendant's Response to Plaintiff's Motion for Summary Judgment was due.

1 2. After conferring, counsel agreed that Defendant would have an additional ten (10)
2 days to file its Response to Plaintiff's Motion for Summary Judgment, making the new deadline
3 per stipulation of the parties, November 28, 2021.

4 3. The reason proffered by Defendant's lead counsel, Ms. Smallwood Miranda, and
5 acquiesced to by Plaintiff's counsel, was the recent unexpected relocation and placement by child
6 services of her five year old great-nephew into her home, and a subsequent illness that kept counsel
7 out of the office for the three weeks prior to the deadline set by this Honorable Court.
8

9 The extension requested is the first request and is made in good faith and is not for the
10 purpose of delay.

11 **IT IS SO STIPULATED.**

12 Dated this 22nd day of November, 2021.

13 Dated this 22nd day of November, 2021.

14 **SMALLWOOD MIRANDA LAW, INC.**

15 **KIND LAW**

16 By: /s/ Christine D. Smallwood Miranda
17 Christine D. Smallwood Miranda, Esq.
18 Florida Bar No. 0018698
19 831 Magnolia Avenue
20 Panama City, FL 32401
21 Lead Attorney for Right-Now Recovery, LLC
22 (Pro Hac Vice)

23 By: /s/ Michael Kind
24 Michael Kind, Esq.
25 Nevada Bar No. 13903
26 8860 S. Maryland Pkwy, Ste. 106
27 Las Vegas, Nevada 89123
28 Attorney for Plaintiff

19 **THE BACH LAW FIRM, LLC**

20 Jason J. Bach, Esq.
21 Nevada Bar No. 7986
22 7881 W. Charleston Blvd., Ste. 165
23 Las Vegas, Nevada 89117
24 Attorney for Defendant (Local Counsel)

25 **ORDER**

26 24th

27 IT IS SO ORDERED dated this ____ day of November, 2021.
28 nunc pro tunc to 11/18/2021

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